

# EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**THOMAS PATRICK CONNALLY, JR.,**

**Defendant.**

**CRIMINAL NO. PX-22-172**

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**DECLARATION OF SPECIAL AGENT BRETT ROWLAND  
IN SUPPORT OF SENTENCING MEMORANDUM**

I, Brett D. Rowland, a Special Agent with the U.S. Department of Health and Human Services - Office of Inspector General (“HHS-OIG”), do hereby declare:

**Introduction and Agent Background**

1. I am a Special Agent with HHS-OIG and have been so employed since October 2010. I currently serve as an Assistant Special Agent in Charge of the Protection Operations Branch. Prior to my employment with HHS-OIG, I was employed as a Special Agent for the U.S. Department of State, Bureau of Diplomatic Security (“DSS”) for approximately four years. In the performance of my duties as a Special Agent for HHS-OIG and DSS, I have led, conducted, and participated in the protection of Cabinet-level Secretaries, Ambassadors, Foreign Dignitaries, Heads of State, and conducted investigations pertaining to violations of federal laws involving threats to government officials. I make this sworn declaration in support of the United States’ Sentencing Memorandum in the above-captioned case. Because this declaration is being submitted for a limited purpose, it does not include all of the facts that I have learned during the course of the investigation.

2. In response to a growing number of threats directed against the current Director of the National Institute of Allergy and Infectious Diseases (“NIAID”), Dr. Anthony Fauci, (Dr. Fauci) and in order to provide a safe and secure environment within which the United States’ response to the COVID-19 pandemic could be conducted, HHS-OIG began protective operations around Dr. Fauci in March 2020. Part of those protective operations involve the vetting of threats received by various means, including mail, voicemail, and e-mails. Most of these threats have been sent to Dr. Fauci at the NIAID. I am a Special Agent assigned to lead the protection effort and investigations of threats sent to Dr. Fauci and other NIH personnel.

3. Since March 2020, Dr. Fauci has received thousands of threats. These threats have been communicated via e-mail, phone, and mail. While Dr. Fauci receives a significant number of the threats sent to HHS employees, since the start of the COVID-19 pandemic Dr. Fauci is not the only HHS employee to receive threats of serious bodily injury or death. Dr. Francis Collins, the Director of the National Institutes of Health until December 2021, for example, has received over approximately 220 threats. Dr. Rachel Levine has also been the recipient of a number of threats. In total, HHS and NIH employees have received over 7,500 threats since March 2020.

4. Once agents within HHS-OIG are notified about the receipt of a threatening e-mail, voicemail, or other communication, those threats are routed for appropriate action. HHS-OIG, and NIH Police Investigators examine the communication for content and sender identification. Upon identifying the sender, HHS-OIG and NIH Police Investigators move to mitigate the threat, including by speaking with the sender of the threat. Those threats that cannot be initially mitigated or resolved are preserved and cataloged for ongoing investigation. Investigators analyze these cataloged threats against new incoming threats and use them to potentially identify the sender of the threats—a process that requires significant additional investigation and data review. Once

investigators are able to identify the individual or individuals responsible for sending the threats, investigators take the necessary steps to mitigate the threat. Investigations involving unknown senders—such as threats sent through anonymous and encrypted email accounts—require enhanced investigative measures that are exhaustive, including requiring additional specialized resources to attempt to identify the senders and provide necessary protections for the victim of the threat. The present case involved each of these aggravating factors.

5. In this case, HHS-OIG, NIH Police, the Federal Bureau of Investigation (FBI), the United States Secret Service (USSS), the Department of Homeland Security Investigations (HSI), and other local law enforcement agencies devoted significant hours and resources to identifying the Defendant. Each threat made by the Defendant resulted in cross-agency communication and awareness and the mobilization of protective intelligence resources necessary to provide protection and forward the investigation. Those targeted by the threats were briefed on the threats and the status of the investigation. That this Defendant sent threats repeatedly over a nine-month period, and that the Defendant used an anonymous encrypted foreign mail provider to send his threats of serious bodily harm and death to Drs. Fauci and Collins and their families, compounded the security concerns. In response, HHS-OIG and NIH Police continued to ensure all necessary protective measures were in place for the targets of the threats.

6. Threats sent to HHS, NIH, and NIAID employees have the ability to hamper and interfere with the ability of those employees to conduct their official government business. For example, threatened employees no longer feel safe in their home and work environments and their freedom of movement can be severely limited. In addition, the stress of being the recipient of death threats is cumulative. A number of agents, investigators, analysts, and digital forensic examiners have been diverted from their typically assigned duties to investigate these threats,

spending thousands of hours on such investigations. This diversion takes away from other departmental investigative priorities.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 29th day of July 2022.

*Brett D. Rowland*

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Special Agent Brett D. Rowland  
U.S. Department of Health and Human  
Services – Office of Inspector General